

City of Bellevue **Development Services Department** Land Use Staff Report

Proposal Name:

St. Mary-on-the-Lake Site Improvements

Proposal Address:

1663 Killarney Way

Proposal Description:

Application for a Shoreline Substantial Development Permit for site improvements to St. Mary-on-the-Lake, located adjacent to Lake Washington. improvements include constructing a new lake access trail to connect the existing campus to the lakefront, and a proposed shelter located approximately 55 feet landward of the Lake Washington shoreline.

File Number:

19-102997-WG

Applicant:

Lee Stanton, Stanton Associates

Decisions Included:

Shoreline Substantial Development Permit

(LUC 20.25E.160)

Planner:

Peter Rosen, Senior Environmental Planner

State Environmental Policy Act Threshold Determination:

Determination of Non-Significance

Elizabeth Stead, Environmental Coordinator

Development Services Department

Director's Decision:

Approval with Conditions

Neid m. Bur

Michael Brennan, Director

Development Services Department

Elizabeth Stead, Land Use Director

Date of Application:

January 9, 2019

Notice of Application:

February 7, 2019

May 2, 2019

Notice of Decision

Deadline for Appeal of Process II Administrative Decisions:

SEPA Determination: May 16, 2019

Shoreline Substantial Development Permit: May 24, 2019 (21 days following publication of a notice of decision and date Ecology

receives the decision)

For information on how to appeal a project proposal, visit the Permit Center at City Hall or call 425-452-6800. Appeal of any Process II Administrative decision must be made by 5 p.m. on the date noted for appeal of the decision. Appeal of the SEPA Threshold Determination and/or Critical Areas Land Use Permit must be made to the City of Bellevue City Clerk's Office. Appeal of the Shoreline Substantial Development Permit must be made to the Washington State Shoreline Hearings Board (contact the project planner for more information on how to file an appeal with the Shoreline Hearings Board).

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Attachments

- 1. Project Plan Attached
- 2. Planting Plan Attached

I. Proposal Description

The applicant requests approval of a Shoreline Substantial Development Permit for site improvements to St. Mary-on-the-Lake, located adjacent to Lake Washington. Proposed improvements include constructing a new lake access trail to connect the existing campus to the lakefront, and a proposed lakefront shelter located approximately 50 feet landward of the Lake Washington shoreline.

There is currently no formal trail access to the lakefront. The proposal would construct a new trail starting from the dead-end of an existing asphalt driveway located approximately 300 feet from the lakeshore. The proposed trail would be 6-feet wide and constructed of a permeable material "Stalok." The stabilized trail would have switchbacks, rockery retaining walls, and landings with benches. Stormwater facilities are designed for infiltration, with a perforated french drain along the side of the trail and a level spreader located 50 feet from the lake to disperse runoff. Accent lighting is proposed along the trail for safety and aesthetic accents.

The trail would be constructed primarily through an existing lawn area. The proposal would not remove any trees within the 50-foot Vegetation Conservation area and would remove 1 significant tree (12' Fig tree) within the 200-foot shoreline jurisdiction. Disturbed areas will be revegetated with native tree, shrub and groundcover plantings.

A lakefront shelter (10' x 20') would be constructed along the new trail, located 50 feet from the ordinary high water mark (OHWM) of Lake Washington. The shelter will include benches and will have integrated lighting on a timer to turn-off at night.

L1.04 LAKE ACCESS TRAIL

TW 851
BW 810

TW 855
BW 815
BW 815
TW 855
BW 815
BW 815
TW 855
BW 815
TW 855
BW 815
BW 8

FIGURE 1 - PROPOSED SHORELINE IMPROVEMENTS

A Shoreline Substantial Development Permit is required for improvements and development within 200 feet of Lake Washington and for proposals that do not meet specific exemption thresholds.

II. Site Description, Zoning, Land Use and Shoreline Environment and Functions

A. Site Description

The project site is located at 1663 Killarney Way Key in the Southwest Bellevue subarea. The site is adjacent to Lake Washington.

St. Mary-on-the-Lake is a 10½ acre residential campus owned by the Congregation of the Sisters of St. Joseph of Peace. The campus contains 3 residential halls, including an assisted-living facility for the Sisters, a retreat facility, a main hall with dining facilities, administrative offices and a chapel. The hillside campus is extensively wooded, slopes to the west, ranging in elevation from 166' at the southeast property corner to 25' at the lake Washington shoreline. The site has over 500' of frontage along the Lake Washington shoreline; major portions of the shoreline have been improved with rock bulkhead and there is an existing dock in the southwest corner of the site. No work is proposed along the waterfront or on the existing dock.

The proposed improvements within shoreline jurisdiction (200 feet landward of the OHWM of Lake Washington) are limited to the trail and lakeshore shelter.

Steep slope critical areas (slopes over 40%) have been identified in the west portion of the site. All proposed site improvements are outside the steep slope area and associated steep slope buffer and structure setback.



FIGURE 2 - SITE CONDITIONS

B. Zoning

The property is zoned R-1.8, a single-family residential zoning district. Surrounding properties are also zoned R-1.8 and developed with single-family residences.

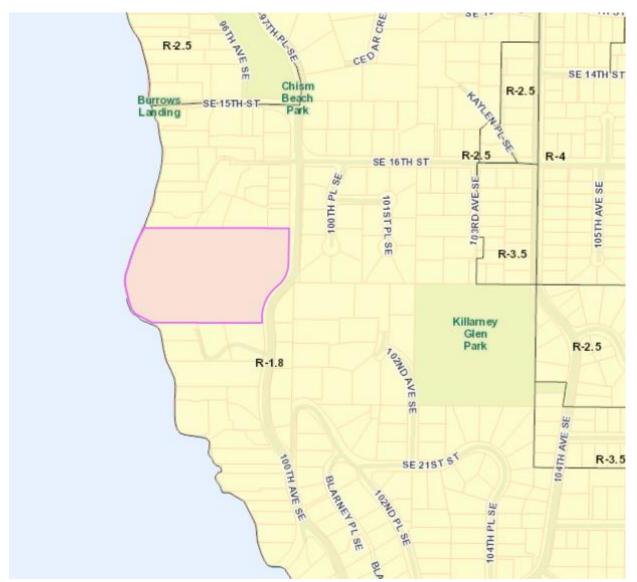


FIGURE 3 - ZONING MAP

C. Land Use Context

The property has a Comprehensive Plan Land Use Designation of SF-L (Single Family Low Density). The project is consistent with this land use designation.

Properties adjacent to and in the immediate vicinity of the site are also in the SF-L land use designation and developed with single family residences.

D. Shoreline Environment and Functions

The site is in the *Shoreline Residential* shoreline environment designation. The purpose of the *Shoreline Residential* environment is to accommodate single or multifamily residential development and appurtenant structures. The *Shoreline Residential* designation is assigned to shorelands which are predominantly characterized by residential development or planned for residential development and exhibit moderate to low levels of ecological functions because of historic shoreline modification activities.

Shorelines provide a variety of functions including shade, temperature control, water purification, woody debris recruitment, channel, bank and beach erosion, sediment delivery, and terrestrial-based food supply (Gregory et al. 1991; Naiman et al. 1993; Spence et al.1996). Shorelines provide a wide variety of functions related to aquatic and riparian habitat, flood control and water quality, economic resources, and recreation, among others. Each function is a product of physical, chemical, and biological processes at work within the overall landscape. In lakes, these processes take place within an integrated system (ecosystem) of coupled aquatic and riparian habitats (Schindler and Scheuerell 2002). Hence, it is important to have an ecosystem approach which incorporates an understanding of shoreline functions and values.

III. Consistency with Land Use Code Requirements:

A. Zoning District Dimensional Requirements:

The site is located in the R-1.8 zoning district. Zoning dimensional standards for structure setbacks, lot coverage, impervious surface area, etc. are found in the Dimensional Requirements in the Shoreline Overlay District (Chart 20.25E.050.A) and discussed below.

B. Shoreline Master Program Requirements LUC 20.25E:

LUC 20.25E.030 - Shoreline Use Charts

The subject site is located in the *Shoreline Residential* shoreline environment designation. *Pedestrian and bicycle facilities* are listed as an allowed use in the *Shoreline Residential* environment with approval of a Shoreline Substantial Development Permit (SSDP). (LUC 20.25E.030, Transportation and Utilities Chart).

<u>Finding:</u> The proposed trail improvements and lakeshore shelter are allowed uses in the *Shoreline Residential* environment designation.

Note (2) in the shoreline use chart states: This use may be approved through the required shoreline review process only if there is no technically feasible alternative pursuant to the requirements of LUC 20.25E.060.C (Technical Feasibility).

LUC 20.25E.060.C - Technical Feasibility Analysis

C. Technical Feasibility Analysis.

 This subsection C applies to new or expanded facilities, systems, techniques, or measures identified as allowed when there is no other technically feasible alternative (the shoreline use charts in LUC 20.25E.030 identify when a technical feasibility analysis is required). This subsection does not apply to residential development governed pursuant to LUC 20.25E.065. The determination of whether an alternative is technically feasible shall be made by the Director as part of the decision on the underlying permit or approval. If a technical feasibility analysis is also required for critical areas located in the Shoreline Overlay District, a single report addressing the criteria contained in LUC 20.25H.055.C.2, and the criteria stated below may be submitted. The applicant shall provide a report prepared by a qualified professional addressing the following locational criteria:

- a. Existing site conditions, including, but not limited to, topography and the proposed location of the facility, system, technique, or measure in relation to the ordinary high water mark and any critical areas on the site;
- b. The location of existing infrastructure necessary to support the proposed facility, system, technique, or measure;
- c. The function or objective of the proposed facility, system, technique, or measure;
- d. The level of risk to a primary structure, public facility, or public use structure or area presented by shoreline erosion, and the ability of the proposed facility, system, technique, or measure to mitigate that risk;
- e. Whether the cost of avoiding the disturbance of the shoreline area is disproportionate as compared to the environmental impact of proposed disturbance, including any continued impacts on functions and values over time; and
- f. The ability of both permanent and temporary construction disturbance to be mitigated.

<u>Finding:</u> The applicant has provided information on existing site conditions, including; topography and the proposed trail location and lakefront shelter in relation to the OHWM of Lake Washington and critical areas on the site.

The objective of the proposed improvements is to provide a safe trail access to the lakefront from the existing campus. Currently, there is no designated walkway to access the lakefront and users must navigate down 300 feet of steep lawn. The proposed trail includes landings with benches and a lakeside shelter to accommodate user access and enjoyment of the lakeshore. The proposed trail alignment includes switchbacks to reduce grades and is located to minimize impacts to the existing slope and vegetation. One (1) significant tree would be removed within the 200-foot shoreline jurisdiction. Most of the disturbed area is currently lawn and would be planted with native species to improve habitat conditions. Permanent and temporary construction disturbance is mitigated. There is no technically feasible alternative to the proposed location of the lake access trail and shelter, which would accomplish the objective of providing a safe access for residents and visitors to Lake Washington and to the existing dock.

<u>Chart 20.25E.050.A – Dimensional Requirements in the Shoreline Overlay District</u>

The following dimensional requirements in the *Shoreline Residential* shoreline environment apply to the proposal:

Shoreline Structure Setback: 50 feet. The proposed lakefront shelter is setback a minimum of 50 feet from the ordinary high water mark (OHWM) of Lake Washington.

Maximum Lot Coverage by Structures: Note (3) states the maximum lot coverage is established by the underlying land use district. The R-1.8 zone allows a maximum lot coverage of 35% of the site area. The proposed lakefront shelter is 200 SF. The existing structures and proposed lakefront shelter would result in a total site coverage of 9%.

Maximum Building Height: 35 feet. The proposed lakefront shelter would have a maximum height of 10 feet.

Maximum Impervious Surface: 50%. Approximately 25% of the site will be impervious surfaces.

<u>Finding:</u> The proposed improvements and the lakefront shelter comply with *Shoreline Residential* dimensional requirements

20.25E.070 - Specific Use Regulations

The proposed improvements within shoreline jurisdiction are considered *Pedestrian and Bicycle Facilities*, which are listed as an allowed use in the *Shoreline Residential* environment in the Transportation and Utilities Chart (LUC 20.25E.030). The *Specific Use Regulations* include requirements and standards applicable to address specific uses and development in the Shoreline Overlay District and includes the following standard for Pedestrian and Bicycle Facilities under Transportation:

20.25E.070.D.3.e:

e. Pedestrian and Bicycle Facilities. Refer to LUC 20.25E.070.C.3.i (Recreational Trails – Development-Specific Performance Standards) for performance standards applicable to standalone pedestrian and bicycle facilities that are not associated with street rights-of-way.

<u>LUC 20.25E.070.C.3.i - Recreational Trails – Development-Specific Performance Standards</u>

Recreational Trails – Development-Specific Performance Standards. All applications for new or expanded, nonmotorized recreational trails shall comply with the following performance standards must meet the following standards in addition to the general requirements in subsections C.2 and C.3.a through C.3.d of this section:

 i. Construction Type. Recreational trails shall be constructed of a soft-surface material or pervious, hard-surfaced material. Impervious surfaces are allowed when the surface is supported by a low-impact development practice as contained in the City's Engineering and Design Standards; ii. Width. Trails shall be the minimum width necessary to accommodate the intended function or objective, but in no case shall the width exceed 10 feet;

iii. Location.

- (1) Soft-Surfaced Trails. Soft-surfaced trails may be located within the shoreline setback and may access the water edge to allow the public to view or touch the water's edge. The number of access points to the water shall be the minimum number necessary to provide the public access to the water while considering the function and planned use of the facility and protecting shoreline ecological functions.
- (2) Hard-Surfaced Pervious Trails. Hard-surfaced pervious trails may be located in the setback and may meander no closer than 15 feet from the ordinary high water mark, except that a hard-surfaced pervious path may be located closer than 15 feet to the ordinary high water mark to allow for access to a viewing facility.
- (3) Impervious Surface Trails. Impervious surface trails shall be located as far away from the ordinary high water mark as feasible. In no event may an impervious surface trail be located closer than a minimum of 25 feet from the ordinary high water mark.
- iv. Trails shall be designed and located to avoid disturbance of significant trees and to limit disturbance of native understory vegetation and avoid disturbance of habitat used for salmonid rearing or spawning or by any species of local importance; and
- v. When critical areas are present in the shoreline setback, crossings over and penetrations into wetlands and stream riparian corridors shall be generally perpendicular to the critical area, and shall be accomplished by bridging or other technique designed to minimize critical area disturbance considering the entire trail segment and function.

<u>Finding:</u> The proposed lake access trail would 6-feet wide and constructed of hard-surfaced pervious material "Stalok." The trail improvements would be no closer than 15 feet from the OHWM, connecting to an existing concrete landing associated with the existing dock. The applicant will provide additional information with the Clearing and Grading Permit to demonstrate the trail material meets hard-surface pervious standards.

LUC 20.25E.060.K. – Vegetation Conservation and Landscape Standards

- 7. Tree Retention and Native Vegetation Standards in the Shoreline Vegetation Conservation Area. Within the shoreline vegetation conservation area, all native vegetation as defined in the City of Bellevue Shoreline Handbook (to be developed), now or hereafter amended, and existing significant trees shall be retained; provided, that the trees are determined to be healthy and the trees can be safely retained consistent with the proposed development activity. Any removal of significant trees or native vegetation shall be in compliance with this section.
- 8. Replanting Requirements in the Shoreline Vegetation Conservation Area. When vegetation removal is allowed, all significant trees removed within the vegetation conservation area shall be replaced at a ratio of 3:1 with a minimum 5-gallon or 2-inch

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caliper size for replacement plantings. Native vegetation other than trees shall be replaced at a spatial ratio of 1:1 to replicate the structural habitat and ecological functions provided by native species.

<u>Finding:</u> No significant trees would be removed within the 50-foot Shoreline Vegetation Conservation Area for the proposed trail improvement and lakefront shelter. The new trail within the 50-foot Shoreline Vegetation Conservation Area is approximately 430 SF. The applicant shall plant a 430 SF area with native plant species within the 50-foot Shoreline Vegetation Conservation Area. The planting plan shall be included with the Clearing and Grading Permit.

IV. Public Notice and Comment

Date of Application:January 9, 2019Public Notice of Application:February 7, 2019Minimum Comment Period:March 11, 2019

The Notice of Application for this project was published in the City of Bellevue weekly permit bulletin. It was mailed to property owners within 500 feet of the project site. Two (2) comments were received:

Dawna Baltins commented on upper parking lot lighting, tree removal in the upper campus area adjacent to neighboring properties, and paving of the upper parking areas. The comments reference proposed improvements in the upper campus area, outside of the 200-foot shoreline jurisdiction and the purview of this shoreline permit. These comments will be addressed under the associated Land Use Exemption permit (19-102996-LJ).

Karen Walter of the Muckleshoot Indian Tribe commented on water rights for irrigation, tree removal within 200 feet of Lake Washington, lighting along the trail and new shelter, stormwater management, and planting plan details. Additional project information was sent and Karen had no further questions.

V. Summary of Technical Reviews

Clearing and Grading:

The Clearing and Grading Division and Utilities Division of the Development Services Department reviewed and approved the proposed development for compliance with codes and standards.

VI. State Environmental Policy Act (SEPA)

The environmental review indicates no probability of significant adverse environmental impacts occurring as a result of the proposal. The Environmental Checklist submitted with the application adequately discloses expected environmental impacts associated with the project. The City codes and requirements, including the Clear and Grade Code, Utility Code, Land Use Code, Noise Ordinance, Building Code and other construction codes are expected to mitigate potential environmental impacts. Therefore, issuance of a Determination of Non-

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Significance (DNS) is the appropriate threshold determination under the State Environmental Policy Act (SEPA) requirements.

A. Earth and Water

The applicant will be required to obtain a clearing and grading permit and follow erosion and sediment control best management practices to prevent sediment impacts in the lake. **See** Conditions of Approval in Section IX of this report

B. Animals

Lake Washington has documented Chinook and Coho salmon rearing habitat and the lake is used by juveniles for migration, although the lake itself does not provide spawning habitat. The proposal does not include any work within or over the water. Fish species and their habitat will be protected during the project construction with implementing erosion and sediment controls to prevent sediment impacts.

C. Plants

No native trees would be removed within the 200-foot shoreline jurisdiction. Disturbed areas will be revegetated with native tree, shrub and groundcover plantings. The proposed planting includes 6 native Vine Maple trees.

VII. Decision Criteria

A. Shoreline Substantial Development Permit Decision Criteria - 20.25E.160.D

The Director may approve or approve with modifications a Shoreline Substantial Development Permit if:

1. The proposal is consistent with the policies and procedures of the Shoreline Management Act;

<u>Finding:</u> As evaluated the proposal is consistent with applicable policies and procedures of the Shoreline Management Act (SMA). The SMA includes broad policies that give priority to water-dependent and water-enjoyment uses. The proposed trail improvement and lakefront shelter are intended to connect the main campus to the lakefront and the existing dock, providing access for water-dependent and water-enjoyment use.

2. The proposal is consistent with the provisions of Chapter 173-27 WAC;

<u>Finding:</u> The proposal is consistent with applicable provisions of Chapter 173-27 WAC, Shoreline Management Permit and Enforcement Procedures.

3. The proposal is consistent with the SMP;

<u>Finding:</u> As evaluated in Section III of this report, the applicant has submitted project plans that demonstrate the proposal's consistency with the policies and procedures of the Shoreline Management Program (SMP).

4. The proposal will be served by adequate public facilities including streets, fire protection, and utilities;

<u>Finding:</u> The site is currently served by adequate public facilities and the proposed trail improvements and lakefront shelter would not impact existing public facilities.

5. The proposal is consistent with the Bellevue Comprehensive Plan; and

<u>Finding:</u> The proposal is consistent with the goals and policies of the Shoreline Management Program Element of the Bellevue Comprehensive Plan:

Goal 3: To protect, preserve, and enhance the natural resources and amenities of the city's shorelines for use and enjoyment by present and future generations.

Goal 4: To increase public, physical, and visual access to and along the city's shoreline areas.

Policy SH-3: Give priority to uses and activities which improve or are compatible with the natural amenities of the shorelines, provide public access, or depend on a shoreline location.

6. The proposal complies with applicable requirements of the Bellevue City Code.

<u>Finding:</u> The proposal complies with applicable requirements of the Bellevue City Code. Construction permits will also be reviewed for compliance with the applicable City of Bellevue Codes and Standards.

VIII. Conclusion and Decision

After conducting the various administrative reviews associated with this proposal, including Land Use Code consistency, SEPA, City Code and Standard compliance reviews, the Director of the Development Services Department does hereby **approve with conditions** the proposed trail improvements and lakefront shelter. Revisions to this approval shall be in accordance with LUC 20.25E.150.E.

Note- Expiration of Approval: In accordance with LUC 20.25E.250.C.2, a Shoreline Substantial Development Permit shall expire and is void two years from the effective date of the permit unless the applicant commences construction activity, or the applicant requests an extension of the shoreline permit.

In accordance with LUC 20.25E.250C.4 Final Expiration of Shoreline Permits. Permit authorization expires finally, despite commencement of construction, five years after the effective date of the relevant shoreline permit, unless the applicant has received an extension pursuant to subsection C.6 of this section.

IX. Conditions of Approval

The applicant shall comply with all applicable Bellevue City Codes and Ordinances including but not limited to:

Applicable Ordinances	Contact Person
Clearing and Grading Code- BCC 23.76	Savina Uzunow, 425-452-7860
Utilities Code	Mohamed Sambou, 425-452-4853
Land Use Code- BCC 20.25E	Peter Rosen 425-452-5210

The following conditions are imposed under the Bellevue City Code or SEPA authority referenced:

1. Construction Permit Approval: Approval of this Shoreline Substantial Development Permit does not constitute an approval of a development permit. Construction permits must be submitted and approved prior to beginning construction. Plans submitted shall be consistent with the project plans as permitted under this approval.

Authority: Land Use Code 20.25E

Reviewer: Peter Rosen, Development Services Department, Land Use

2. Trail Construction: Impervious surface trails are not allowed within 25 feet of the ordinary high water mark (OHWM) of the lake. The applicant will provide additional information with the Clearing and Grading Permit to demonstrate the trail surface material meets hard-surface pervious standards.

Authority: Land Use Code 20.25E.070.C.3.i

Reviewer: Peter Rosen, Development Services Department, Land Use

3. Shoreline Vegetation Planting: The applicant shall plant a 430 SF area with native plant species within the 50-foot Shoreline Vegetation Conservation Area to mitigate for the trail improvements. The planting plan shall be included with the Clearing and Grading Permit.

Authority: Land Use Code 20.25E.060.K

Reviewer: Peter Rosen, Development Services Department, Land Use

4. Tree Protection: The Clearing and Grading Permit submittal shall show limits of work consistent with the approved project plans and shall include tree protection measures to protect significant trees from impacts related to construction activity.

Authority: Land Use Code 20.30P.140

Reviewer: Peter Rosen, Development Services Department

5. Final Mitigation Plan: A final mitigation planting plan shall be submitted with the Clearing and Grading permit. The plans shall specify plant species, sizes, quantities, and spacing.

The final planting mitigation plan shall also include performance standards to measure the successful establishment of the mitigation plantings. The following performance standards are required:

Year 1 (from date of plant installation)

- 100% survival of all installed plants and/or replanting in following dormant season to reestablish 100%
- Less than 5% cover of non-regulated Class A, B, or C noxious weeds as identified on the King County Noxious Weed List.
- No (0%) regulated Class A, B, or C noxious weeds.

Year 2 (from date of plant installation)

- 90% survival of all installed plants and/or replanting in following dormant season to reestablish 90%
- Less than 5% cover of non-regulated Class A, B, or C noxious weeds as identified on the King County Noxious Weed List.
- No (0%) regulated Class A, B, or C noxious weeds.

Year 3

- Greater than 60% cover of installed and volunteer native plants.
- Less than 10% cover of non-regulated Class A, B, or C noxious weeds as identified on the King County Noxious Weed List.
- No (0%) regulated Class A, B, or C noxious weeds.

Year 4

- Greater than 75% cover of installed and volunteer native plants.
- Less than 15% cover of non-regulated Class A, B, or C noxious weeds as identified on the King County Noxious Weed List.
- No (0%) regulated Class A, B, or C noxious weeds.

Year 5

- Greater than 80% cover of installed and volunteer native plants.
- Less than 15% cover of non-regulated Class A, B, or C noxious weeds as identified on the King County Noxious Weed List.
- No (0%) regulated Class A, B, or C noxious weeds.

Authority: Land Use Code 20.30P.140; 20.25H.220

Reviewer: Peter Rosen, Development Services Department

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6. Maintenance and Monitoring Surety: A financial surety is required to be submitted to ensure the mitigation planting successfully establishes. A maintenance assurance device that is equal to 50% of the cost of plants, installation, and the cost of monitoring is required to be held for a period of five years from the date of successful installation. A cost estimate is required to be provided with construction permits. The financial surety is required to be posted prior to construction permit issuance. Release of the surety after the 5-year monitoring period is contingent upon a final inspection of the planting by Land Use Staff that finds the maintenance and monitoring plan was successful and the mitigation meets performance standards.

Authority: Land Use Code 20.25H.220

Reviewer: Peter Rosen, Development Services Department

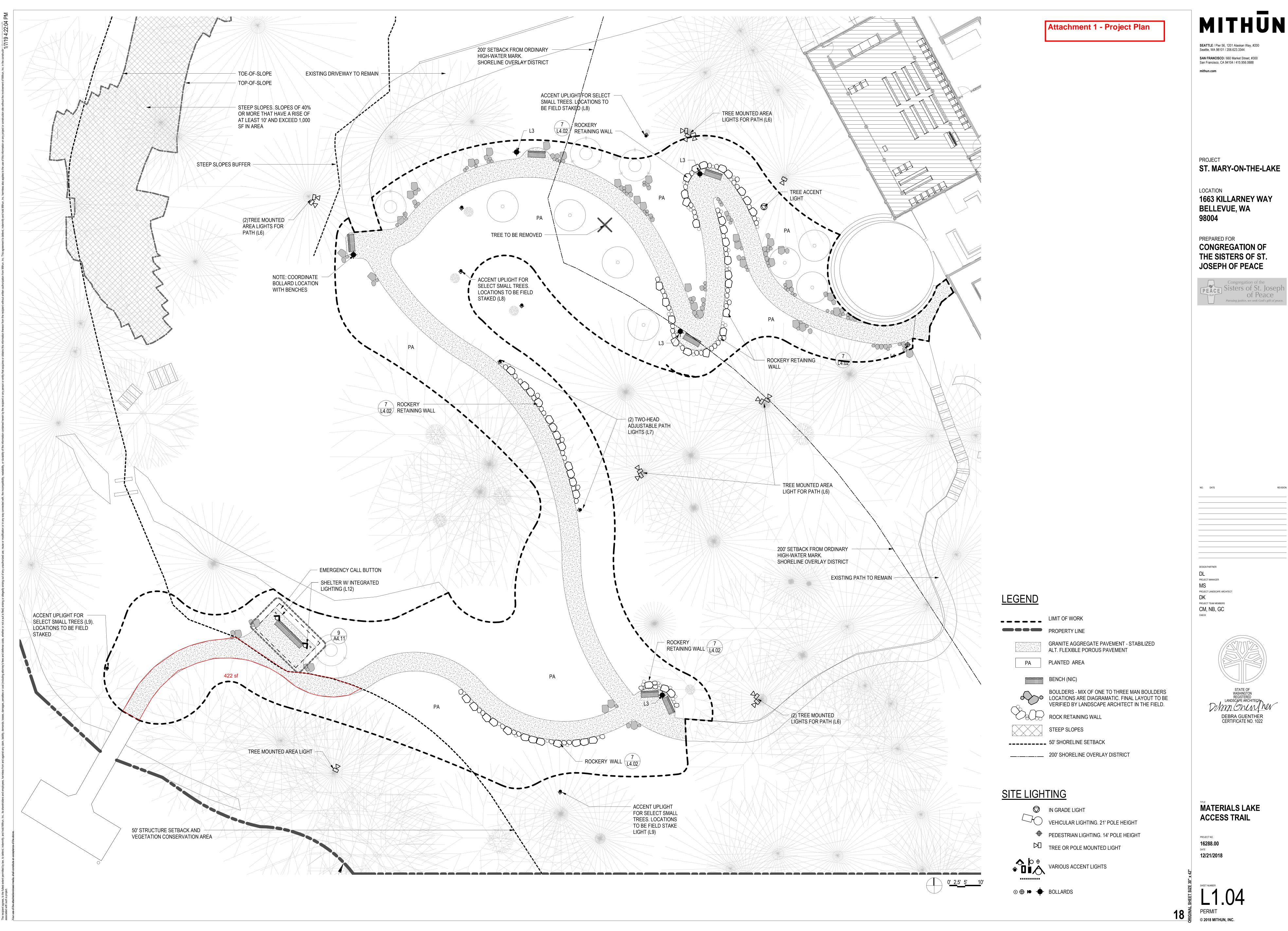
7. Maintenance and Monitoring Reports: The mitigation planting is required to be maintained and monitored for five years to ensure the plants successfully establish. Annual monitoring reports are required to be submitted to document the plants are meeting approved performance standards. Photos from selected photo points shall be included in the monitoring reports to document the planting. Land Use inspection is required by Land Use staff to end the plant monitoring period.

Reporting shall be submitted no later than December 31st of each monitoring year and shall include a site plan and photos from photo points established at the time of Land Use inspection. Reports shall be submitted to Peter Rosen or Heidi Bedwell by the above listed date and can be emailed to prosen@bellevuewa.gov or mailed directly to:

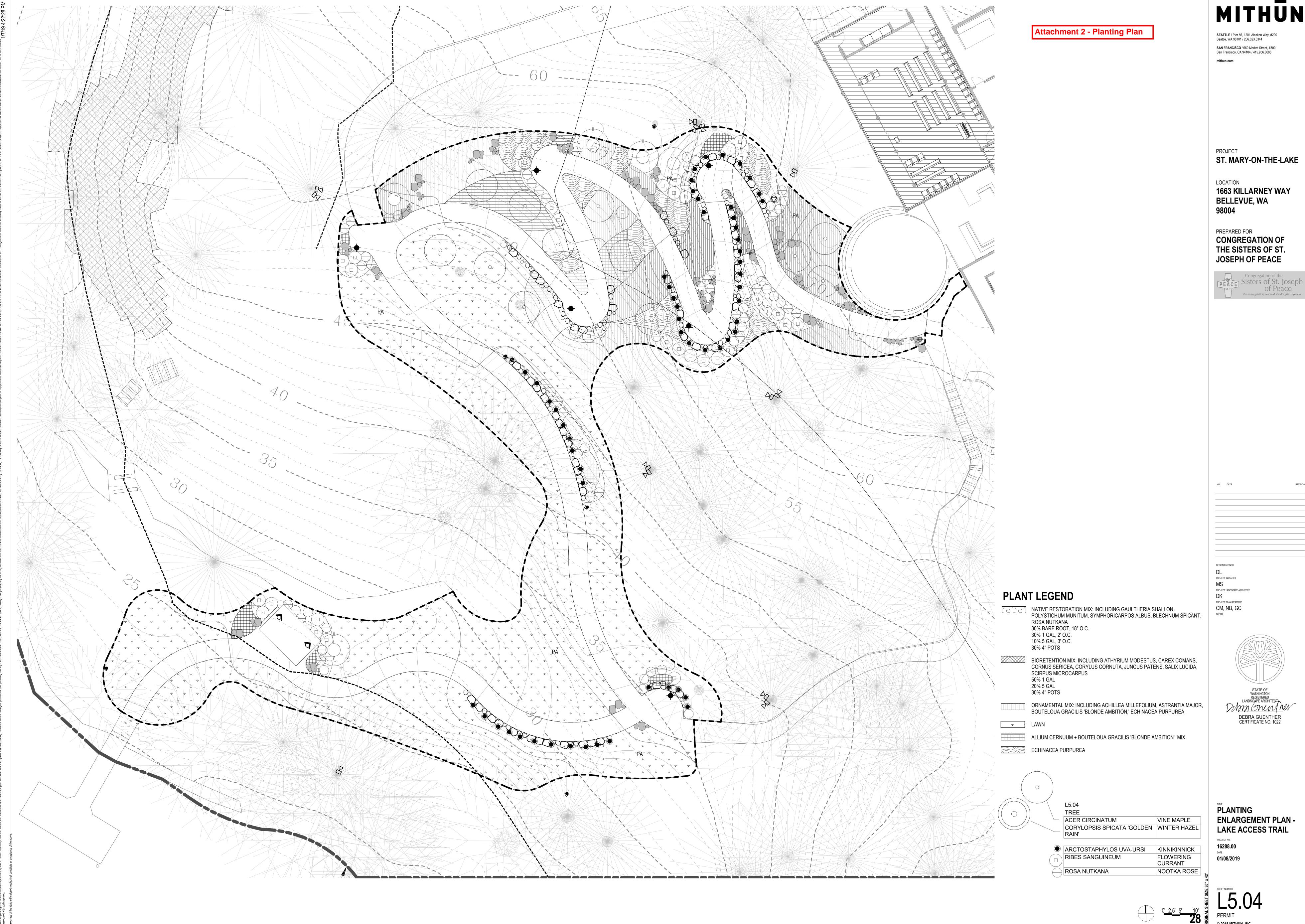
Environmental Planning Manager Development Services Department City of Bellevue PO Box 90012 Bellevue, WA 98009-9012

Authority: Land Use Code 20.30P.140; 20.25H.220

Reviewer: Peter Rosen, Development Services Department



MITHUN



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